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8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS.

**EVIDENTIARY STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
YOUTUBE'S PRODUCTION FROM
NONCUSTODIAL SOURCES**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

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19 IT IS HEREBY STIPULATED by and between Defendants YouTube, LLC and Google
20 LLC (together, "YouTube"), and PI/SD Plaintiffs (collectively, the "Parties"), by and through their
21 respective counsel of record that:

22 The documents identified in the attached **Exhibit A** are true and correct copies of data
23 stored in YouTube's F Source. F Source is a YouTube repository and complaints tracking system
24 that stores customer service tickets, reports, and related information, which can also be used by
25 Googlers to communicate with users. F Source is currently used by various YouTube legal
26 operation teams to respond to complaints from external parties, as well as internal escalations,
27 appeals, and other use cases. These documents are records of regularly conducted activity under
28 Fed. R. Evid. 803(6). This data from F Source was collected and produced in the manner described

1 in **Exhibit A**. This stipulation is not intended to address the admissibility of the underlying
2 statements made by the individuals submitting user feedback, which YouTube reserves the right
3 to challenge on any and all grounds permitted by applicable state or federal law, or the Federal
4 Rules of Evidence.

5 The documents identified in the attached **Exhibit B** are true and correct copies of data
6 stored in Google's L Source. L Source is a Google-wide platform that stores and provides an
7 interface tool for user feedback and surveys. L Source permits the operations team to review
8 feedback, assign issues tags, and take action. These documents are records of regularly conducted
9 activity under Fed. R. Evid. 803(6). This data from L Source was collected and produced in the
10 manner described in **Exhibit B**. This stipulation is not intended to address the admissibility of the
11 underlying statements made by the individuals submitting user feedback, which YouTube reserves
12 the right to challenge on any and all grounds permitted by applicable state or federal law, or the
13 Federal Rules of Evidence.

14 The documents identified in the attached **Exhibit C** are true and correct copies of data
15 stored in Google's A Source. A Source is an internal launch release tool and repository of past
16 launches. A Source contains records detailing information on feature development, launches, and
17 related approvals. These documents are records of regularly conducted activity under Fed. R. Evid.
18 803(6). This data from A Source was collected and produced in the manner described in **Exhibit**
19 **C**.

20 The documents identified in the attached **Exhibit D** are true and correct copies of data
21 stored in Google's B Source. B Source is an internal Google-wide application that stores data and
22 communications related to a wide range of tickets (or "issues") related to escalation of bugs,
23 glitches, or other internal and external requests and questions. These documents are records of
24 regularly conducted activity under Fed. R. Evid. 803(6). This data from B Source was collected
25 and produced in the manner described in **Exhibit D**. This stipulation is not intended to address the
26 admissibility of the underlying statements made by the individuals submitting user feedback,
27 which YouTube reserves the right to challenge on any and all grounds permitted by applicable
28 state or federal law, or the Federal Rules of Evidence.

1 The documents identified in the attached **Exhibit E** are true and correct copies of data
2 stored in YouTube's M Source, originating from the S Source. The S Source is a third-party
3 customer experience management platform that stores social media posts, interactions, and related
4 information. These documents are records of regularly conducted activity under Fed. R. Evid.
5 803(6). This data from the M Source was collected and produced in the manner described in
6 **Exhibit E**. This stipulation is not intended to address the admissibility of the underlying statements
7 made by the individuals submitting user feedback, which YouTube reserves the right to challenge
8 on any and all grounds permitted by applicable state or federal law, or the Federal Rules of
9 Evidence.

10 1. The documents identified in the attached **Exhibit F** are true and correct copies of
11 data stored in YouTube's C Source. The C Source is a deprecated customer experience
12 management platform that stores social media posts, interactions, and related information. These
13 documents are records of regularly conducted activity under Fed. R. Evid. 803(6). This data from
14 the C Source was collected and produced in the manner described in **Exhibit F**. This stipulation
15 is not intended to address the admissibility of the underlying statements made by the individuals
16 submitting user feedback, which YouTube reserves the right to challenge on any and all grounds
17 permitted by applicable state or federal law, or the Federal Rules of Evidence.

18 The Parties may mutually agree to amend Exhibits A-F to the extent additional documents are
19 later produced or identified.

20 This Stipulation applies to this action only and accordingly can be relied upon and asserted
21 by only the Parties to this action. This Stipulation is not intended for use in any other proceeding
22 and, as such, may not be cited or used against any Party in any other proceeding by any party or
23 third party.

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25 **IT IS SO STIPULATED AND AGREED,**
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1 DATED: August 25, 2025

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

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ATTESTATION

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 25, 2025

By: /s/ Christopher Chiou
Christopher Chiou

ORDER

IT IS SO ORDERED that the foregoing Stipulation is approved:

DATED: August 26, 2025


Hon. Peter H. Kang
United States District Court Magistrate Judge